

# GRAY, HARRIS & ROBINSON

PROFESSIONAL ASSOCIATION

ATTORNEYS AT LAW

SUITE 250

225 SOUTH ADAMS STREET

POST OFFICE BOX 11189

TALLAHASSEE, FL 32302-3189

TELEPHONE (850) 222-7717

FAX (850) 222-3494

J. CHARLES GRAY  
 GORDON H. HARRIS  
 RICHARD M. ROBINSON  
 PHILLIP R. FINCH  
 PAMELA O. PRICE  
 JAMES F. PAGE, JR.  
 WILLIAM A. BOYLES  
 THOMAS A. CLOUD  
 BYRD F. MARSHALL, JR.  
 J. MASON WILLIAMS, III  
 LEO P. ROCK, JR.  
 G. ROBERTSON DILG  
 CHARLES W. SELL  
 JACK A. KIRSCHENBAUM  
 RICHARD E. BURKE  
 GUY S. HAGGARD  
 FREDERICK W. LEONHARDT  
 BORRON J. OWEN, JR.  
 MICHAEL K. WILSON  
 JEFFREY D. KEINER  
 PAUL S. QUINN, JR.  
 DAVID L. SCHICK  
 JACK K. McMULLEN  
 SUSAN T. SPRADLEY  
 MICHAEL E. NEUKAMM  
 DONALD A. NOHRR  
 PHILIP F. NOHRR  
 WILLIAM G. BOLTIN, III  
 R. LEE BENNETT  
 TRACY A. MARSHALL  
 JOHN A. KIRST, JR.  
 WILBUR E. BREWTON  
 KENNETH J. PLANTE

MICHAEL E. WRIGHT  
 WILLIAM A. GRIMM  
 KENT L. HIPPE  
 DONALD H. GIBSON  
 ALISON M. YURKO  
 THEODORE L. SHINKLE  
 JOHN M. BRENNAN  
 SCOTT W. SPRADLEY

KIMBERLY NOWORYTA SUNNER  
 BRUCE M. HARRIS  
 R. DEAN CANNON, JR.  
 FRANK A. HAMNER  
 RICHARD A. RODGERS  
 KELLY M. FITZGERALD  
 KELLY BREWTON PLANTE  
 J. SCOTT SIMS  
 CATHERINE M. PECK  
 LORI T. MILVAIN  
 MATTHEW S. SMITH  
 CHRISTINE A. NOWORYTA  
 W. CHRISTOPHER BROWDER  
 MARTHA H. MCINTOSH  
 LISA A. SPECHT  
 GREGORY W. MEIER  
 GREGORY W. GLASS

OF COUNSEL

MALCOLM R. KIRSCHENBAUM  
 SYDNEY L. JACKOWITZ  
 LILA INGATE MCHENRY  
 MICHAEL J. CANAN

April 27, 1999

### VIA HAND DELIVERY

Ms. Blanca S. Bayó, Director  
 Division of Records and Reporting  
 Public Service Commission  
 2540 Shumard Oak Boulevard  
 Tallahassee, FL 32399-0850

Re: International Marketing & Advertising, Inc.  
 Docket Number: 981937-TI

Dear Ms. Bayó:

This Firm represents International Marketing & Advertising, Inc. This letter is in response to the Final Order issued April 6, 1999, which purports to cancel International Marketing & Advertising, Inc.'s Certificate Number 5262 for failure to file the Regulatory Assessment Fee Return and the pay the necessary fees which accompany such Return for the year 1997. The Order also purports to assess a fine of \$500.00 for failure to file the Regulatory Assessment Fee Return and pay the accompanying fees for 1997, as well as, assess a fine in the amount of \$500.00 for an alleged violation of Rule 25-24.480(1)(b), Florida Administrative Code.

*RAR*  
*Paula Isler*  
*Catherine Bede*

This letter is to inform the Public Service Commission that International Marketing & Advertising, Inc. wishes to keep its Certificate. Unfortunately, due to an oversight by the company, International Marketing & Advertising, Inc. failed to file the proper Assessment Returns. However, the company has taken steps to take care of this oversight and will file the Assessment Returns and pay the accompanying fees on a timely basis in the future.

Enclosed please find the 1997 Regulatory Assessment Fee Return accompanied by a check in the amount of \$70.00 for the requisite

DOCUMENT NUMBER-DATE

07534 JUN 22 99

FPSC-RECORDS/REPORTING

MELBOURNE  
 (407) 727-8100

ORLANDO  
 (407) 843-8880

TALLAHASSEE  
 (850) 222-7717

AFA  
 APP  
 CAF  
 CMU  
 CTR  
 EAG  
 LEG  
 MAS  
 CPC  
 RRR  
 SEC  
 WAV  
 OTH

*cy to Nonaye -*  
*fyI*

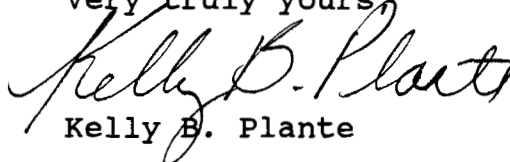
Ms. Blanco Bayó  
April 27, 1999  
Page 2

fee, penalty and interest for the 1997 Return. In addition, please find the 1998 Regulatory Assessment Fee and Return accompanied by a check in the amount of \$59.00 for the requisite fee, penalty and interest for the 1998 Return.

Both the 1997 and 1998 Returns contain the current address for the company as well as the individual's title and phone number who is responsible for ensuring that the Regulatory Assessment Fee Returns are filed on a timely basis in the future.

Based on the foregoing, we would request that the Public Service Commission compromise the fines assessed against International Marketing & Advertising, Inc. from \$500.00 per offense to \$100.00 per offense for a total of \$200.00. Your consideration in this matter is greatly appreciated.

Very truly yours,

  
Kelly B. Plante

KBP/amc  
Enclosures  
IMA\IMA-1002  
cc: Mr. Roberto Galoppi  
Robert Paterno, Esquire

**Interexchange Company Regulatory Assessment Fee Return**

**Florida Public Service Commission**

(See Filing Instructions on Back of Form)

STATUS:

Actual Return  
 Estimated Return

PERIOD COVERED:  
 11/04/1997 TO 12/31/1997

TI678  
 International Marketing & Advertising, Inc.  
 250 Catalonia Avenue, Suite 250  
 Coral Gables, FL 33134-6735  
 DEPOSIT DATE  
**D131** APR 29 1999

**FOR PSC USE ONLY**  
 Check# 5281  
 \$ 50.00 0603001  
 \$ 12.50 P 003001  
 \$ 7.50 I 0603001  
 004011  
 Postmark Date 4/22/99  
 Initials of Preparer vm

Please Complete Below If Official Mailing Address Has Changed

INTERNATIONAL MARKETING + ADVERTISING, INC PO BOX 143973 CORAL GABLES, FL 33114  
 (Name of Company) (Address) (City/State) (Zip)

LINE NO.	ACCOUNT CLASSIFICATION	GROSS OPERATING REVENUE	INTRASTATE REVENUE
1.	Long Distance Services	\$ _____	\$ _____
2.	Access Services	_____	_____
3.	Private Line Services	_____	_____
4.	Leased Facilities & Circuits Services	_____	_____
5.	Miscellaneous Services	<u>371 599.39</u>	<u>0.00</u>
6.	TOTAL Telephone Services	\$ <u>371 599.39</u>	\$ <u>0.00</u>
7.	LESS: Amounts Paid For Services To Local Telephone Companies* (Attach Listing)	( _____ )	( _____ )
8.	TOTAL REVENUES For Regulatory Assessment Fee Calculation	_____	_____
9.	Regulatory Assessment Fee Due (Multiply Line 8 by 0.0015)	_____	<u>50.00</u>
10.	Penalty for Late Payment	_____	<u>12.50</u>
11.	Interest for Late Payment	_____	<u>7.50</u>
12.	TOTAL AMOUNT DUE	_____	\$ <u>70.00</u>

\*Each amount paid by an interexchange telecommunications company to a telecommunications company providing local service for use of the local network shall be deducted from intrastate revenue for purposes of determining the amount of the regulatory fee assessed the interexchange telecommunications company.

AS PROVIDED IN SECTION 364.336, FLORIDA STATUTES, THE MINIMUM ANNUAL FEE IS \$50

**CURRENT COMPANY STATUS**

Facilities-Based Carrier  Reseller  Call Aggregator  
 Alternate-Operator Service  Rebiller  Other: PREPAID DEBIT CARD PROVIDER

**BILLING INFORMATION**

Complete below if billing agent if other than yourself.

I.M.A.  COMMERCIAL BANK OF FLORIDA 5281  
 INTERNATIONAL MARKETING AND ADVERTISING  
 P.O. BOX 143973 MIAMI SPRINGS, FL 33166  
 CORAL GABLES, FL 33114  
 PH. (305) 446-1303  
 4/22/99

PAY TO THE ORDER OF Florida Public Service Commission \$ **\*\*70.00**

Seventy and 00/100 \*\*\*\*\*  
 Florida Public Service Commission

DOLLARS Security features included. Details on back.

TWO SIGNATURES REQUIRED OVER \$1,000.00

MEMO 65-0514571

Interexchange Company Regulatory Assessment Fee Return

STATUS:

Actual Return  
 Estimated Return

PERIOD COVERED:  
 01/01/1998 TO 12/31/1998

Florida Public Service Commission

(See Filing Instructions on Back of Form)

TI678  
 International Marketing & Advertising, Inc.  
 250 Catalonia Avenue, Suite 250  
 Coral Gables, FL 33134-6735  
 DEPOSIT  
**D 1 3 1 \* APR 2 9 1999**

FOR PSC USE ONLY  
 Check# 5282  
 \$ 50.00 0603001  
 \$ 7.50 003001  
 P 0603001  
 004011  
 \$ 1.50 I  
 Postmark Date 4/22/99  
 Initials of Preparer vm

Please Complete Below If Official Mailing Address Has Changed

INTERNATIONAL MARKETING + ADVERTISING, INC P.O. BOX 143973 CORAL GABLES, FL 33114  
 (Name of Company) (Address) (City/State) (Zip)

LINE NO.	ACCOUNT CLASSIFICATION	GROSS OPERATING REVENUE	INTRASTATE REVENUE
1.	Long Distance Services	\$ _____	\$ _____
2.	Access Services	_____	_____
3.	Private Line Services	_____	_____
4.	Leased Facilities & Circuits Services	_____	_____
5.	Miscellaneous Services	<u>364,605.74</u>	<u>0.00</u>
6.	TOTAL Telephone Services	\$ <u>364,605.74</u>	\$ <u>0.00</u>
7.	LESS: Amounts Paid For Services To Local Telephone Companies* (Attach Listing)	( _____ )	( _____ )
8.	TOTAL REVENUES For Regulatory Assessment Fee Calculation	_____	_____
9.	Regulatory Assessment Fee Due (Multiply Line 8 by 0.0015)	_____	<u>50.00</u>
10.	Penalty for Late Payment	_____	<u>7.50</u>
11.	Interest for Late Payment	_____	<u>1.50</u>
12.	TOTAL AMOUNT DUE	_____	\$ <u>59.00</u>

\*Each amount paid by an interexchange telecommunications company to a telecommunications company providing local service for use of the local network shall be deducted from intrastate revenue for purposes of determining the amount of the regulatory fee assessed the interexchange telecommunications company.

AS PROVIDED IN SECTION 364.336, FLORIDA STATUTES, THE MINIMUM ANNUAL FEE IS \$50

CURRENT COMPANY STATUS

Facilities-Based Carrier  Reseller  Call Aggregator  
 Alternate-Operator Service  Rebiller  Other: PREPAID DEBIT CARD PROVIDER

BILLING INFORMATION

Complete below if billing agent if other than yourself.

I.M.A.  
 INTERNATIONAL MARKETING AND ADVERTISING  
 P.O. BOX 143973  
 CORAL GABLES, FL 33114  
 PH. (305) 446-1303

COMMERCIAL BANK OF FLORIDA  
 MIAMI SPRINGS, FL 33166

5282

4/22/99

PAY TO THE ORDER OF Florida Public Service Commission

\$ \*\*59.00

Fifty-Nine and 00/100\*\*\*\*\*

Florida Public Service Commission

DOLLARS  
 Security features included.  
 Details on back.

TWO SIGNATURES REQUIRED OVER \$1,000.00